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February 27, 2015

VIA ECF

Honorable Magistrate Judge Marilyn D. Go
United States District Court
225 Cadman Plaza East
Room 1214-S
Brooklyn, New York 11201

Re: **Eleno Mendez, et al. v. Rosangem Restaurant Inc. d/b/a Casa Pepe Restaurant, et al.**
Index No. 14-CV-4080
MCB File No. 08050-083836

Dear Magistrate Judge Go:

On behalf of Rosangem Restaurant, Inc. d/b/a Casa Pepe Restaurant and Geminiano Sanz (collectively, "Casa Pepe") we respond to Your Honor's request that Casa Pepe advise whether it will voluntarily produce the summary analysis, which is referenced in Plaintiffs' counsel's February 6th letter.

For the reasons set forth in Casa Pepe's February 13, 2015 letter to the Court, Casa Pepe respectfully declines to voluntarily produce the summary analysis. We respectfully submit that Plaintiffs' counsel has not met the applicable standards of "substantial need" or "undue hardship" as all of the underlying documents have been produced, and he can (if he wishes) create his own report and analysis.

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Thank you for your consideration.

Respectfully submitted,

MARTIN CLEARWATER & BELL LLP

/s/
Gregory B. Reilly

cc: Peter Cooper, Esq. (via ECF)